

Exhibit K

Lisa Schiavone

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
MICHELLE YVETTE AMIN, et al

AFFIDAVIT OF
LISA SCHIAVONE

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF SUFFOLK)

LISA SCHIAVONE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 498 North 4th Street, Lindenhurst, New York 11757.

2. I am currently 53 years old, having been born on August 29, 1968.

3. I am the wife of James Anthony Schiavone, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from metastatic colon cancer on December 12, 2017, at the age of 49. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. I had a great relationship with my husband Jimmy. I had been together with him since I was 14 years old. We raised three children together, and Jimmy would coach them in youth sports when they were growing up. We were always in each other's daily lives and would eat dinner together, watch our favorite shows, discuss our daily plans every morning, talk about our children – we spoke about anything and everything. We would go out on walks together for

about 5 miles every day, even becoming known as “the walkers.” We would go out and meet friends or to have dinner. Sundays were our family day, and we would also spend time with our extended family, like our nieces and nephews. We had a good life and had a lot of fun. There are so many wonderful memories.

6. Jimmy was a detective in the New York City Police Department and on the morning of the September 11, 2001, terrorist attacks, he was going to court in Queens. However, with the attacks, he turned around and headed for lower Manhattan. By the time he got there, the first tower had already fallen. Jimmy would stay at Ground Zero the rest of that day and the next. He continued working at Ground Zero for about six months. The first three months were more than full-time – he was there about 12 hours a day, every day – as part of the search and recovery efforts. He spent the next three months on “the Pile,” as they called it, as part of the cleanup efforts, working about eight to ten hours a day, with some days spent at his command.

7. The first time I saw Jimmy after the attacks was the night of September 12th. He came home and was covered in white dust. He told me that he was going to get sick from the experience. I told him not to say that, but he still thought he would get sick. I will never forget this conversation, and he would get sick about 15 years later.

8. In May of 2016, my oldest daughter was graduating from college. It was graduation week, and Jimmy kept laying on the couch saying that he was exhausted. When I heard this, it reminded of how my mother described feeling when she was sick with cancer. Because of this, I told him to go see the doctor, and he said he would after the graduation. When we got to our daughter’s college to help move her out, she commented to me that Jimmy did not look right. We went to a diner after moving her out, and Jimmy’s teeth were chattering – he was freezing. He was the type of person who was never freezing and would even wear shorts in winter.

9. Jimmy went to the doctor when we got home from the graduation. His bloodwork showed that he was anemic – he had never been anemic before and was only 46 years old. The doctor said he needed more testing. They thought it might be a bleeding ulcer or something similar. After more testing showed some of his levels were high, the doctor ordered a colonoscopy and endoscopy. He had these exams done over Memorial Day weekend in 2016. The doctor reported that the endoscopy was ok, but the colonoscopy could not be completed due

to a mass in his rectum. The doctor thought it was likely a tumor and in his professional opinion, it would be malignant.

10. There were some celebrations that we attended that weekend, and people commented that Jimmy looked pale like a ghost. After a sonogram about a week later, we returned to see the doctor for a follow-up appointment. When the nurse came in ahead of the doctor, Jimmy had practically resigned himself that the tumor would be malignant. He was able to access the results on his phone before the doctor was able to share them. It was then that Jimmy learned for sure that the tumor was malignant and that he had cancer. After speaking with the doctor, we learned that it was, in essence, stage IV cancer because it had already spread to his liver and stomach. Jimmy would additionally need surgery to remove the tumor and would need a colostomy bag as a result. It was unfathomable, and I felt like I was going to vomit. Jimmy became pale as a ghost, and we went out to the car together and cried in the parking lot.

11. Jimmy had the surgery to remove the tumor from his colon and put in the colostomy bag. It was successful but seeing him after the surgery was difficult. He was all bruised and was in so much pain, and this pain would not stop despite pain medication. They had him so that he could not move but could still talk. He was covered in towels, and it looked like he was mummified. I did not even want to see him in such a state, but I stayed with him all night.

12. Jimmy was highly embarrassed with the colostomy bag. He did not even want to look at it, so I had to help him for the first three or so months. I have the weakest stomach so helping him manage this was very difficult for me. But you find strength when you find yourself in such situations. I did not want to add to his insecurities.

13. I cared for Jimmy all the time and did everything I possibly could. I gave 24 hours a day, 7 days a week to him. I went to every single doctor's appointment, every chemotherapy treatment, every sonogram – anything and anywhere. We would even occasionally need to go to the emergency room in the middle of the night. He needed constant care, and it was difficult for me to watch a man I grew up with become helpless like a child due to cancer.

14. My husband fought his cancer and did everything the doctor told him to do. He wanted to get better so badly but eventually, he did not have the strength anymore. I remember one time he said to me, "you know I am dying." He said he felt it and knew he was not coming back. He made me promise that I would take care of the kids and myself and thanked me for

caring for him. Jimmy would pass away from his cancer in December 2017 at only 49 years old.

15. I would not trade what I did for the world, but I feel that at the same time, I did not give enough of my time to my children. I short-changed them at the time because I was so focused on caring for Jimmy. There were things I missed, but I could not leave Jimmy's side. I would sleep by his side in the hospital day in and day out.

16. I cannot look at my children's faces without feeling sad because I know that they will never hear their father's voice, laugh or joke with him, or even yell at him ever again. It breaks my heart. As a mother, you want to fix whatever you can for your children, but I cannot fix this. Our family is broken, and it can never be repaired. There is a piece missing. This is especially noticeable on holidays, such as Easter most recently.

17. I think I do a good job as a mother, but not as much as I could. With Jimmy gone, I now realize how much he would do. I realize that to run a house, you need two people. And to raise a family, you need two people. That second person is very important in those situations and for moral and physical support. I also think a lot about my son who will miss out on advice that you can only really get from your father. He has lost out on that.

18. I still wake up and look at my phone as if Jimmy is going to send me a good morning text. Or I will find myself in a situation and say, "I can't wait to tell Jimmy that." Or I think to ask Jimmy because I do not remember something. But then I realize that he is no longer here. And everything in our house reminds me of him. I miss his laugh, and I even miss him yelling at the television over the Yankees game. There is so much of him I miss, and it is very hard for me emotionally. He was my best friend and was by my side through major events in my life. He was my strength. I wish I could sit with him, hear his voice, and touch him.

19. I feel we were robbed. Jimmy and I married young and had kids young so that when we retired, we could do things and travel. He would tell me that we were going to be the best grandparents. We would have sleepovers with the grandchildren and spend time with them, and he joked that we would let them do whatever their parents would not let them do. He was robbed of being a grandparent and of many other experiences, such as walking his daughters down the aisle at their weddings.

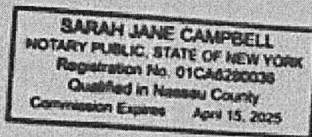
20. I recently attended a ceremony in the Bronx held by the New York City Police Department. They do not forget what Jimmy did, and I am proud of him. But it is not fair. It is

not fair for my children to be without their father, and it is not fair for me to be without my husband. My only wish is that Jimmy did not get sick and that he was still here with us.

Lisa Schiavone
LISA SCHIAVONE

Sworn to before me this
11 day of July, 2022

Sarah Jane Campbell
Notary Public



Michael James Schiavone

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
MICHELLE YVETTE AMIN, et al

**AFFIDAVIT OF
MICHAEL JAMES SCHIAVONE**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF SUFFOLK)

MICHAEL JAMES SCHIAVONE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 498 North 4th Street, Lindenhurst, New York 11757.

2. I am currently 26 years old, having been born on March 20, 1996.

3. I am the son of James Anthony Schiavone, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from metastatic colon cancer on December 12, 2017, at the age of 49. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. I was 21 years old at the time of my father's death.

6. I had a good relationship with my father. Whenever I needed him, he was always by my side. And although it may sound cliché to say this, he was my best friend too. We were the only two men in the house growing up, and he would coach me in and support me at youth sports. He was always there to support me unless work came up. In general, he was always there

for me, whenever I needed him. My father was a great man.

7. I was in kindergarten at the time of the September 11, 2001, terrorist attacks, but I remember leaving school early that day and my dad not coming home. I do not think I saw him for about the next two weeks. My father worked with the New York City Police Department, and I understand that on the day of the attacks, he went to Ground Zero to assist with the search and recovery efforts and that he continued working there in the weeks and months afterwards.

8. Before my father was diagnosed with cancer, I had noticed little things about him were off. He was not acting like himself, and his eating habits were not the same. I realized something was wrong the weekend my sister was graduating from college. We went to a diner near the school for dinner, and my father was freezing. This was unusual, and the rest of us were comfortable with the temperature. So, when my father called my sisters and me into the living room to talk that following week, I knew something was up. It was there that I learned about my father's illness. I was told he had stage IV colon cancer. I will never forget that day.

9. I helped care for my father at home while he was sick. My mother was a rock and went to every single chemotherapy appointment with my father. But when he was at home and needed help, like to hold something if he was getting sick, I would be there for him. I remember him coming home and being achy and in pain, especially with his bones. Sometimes, he would take medication to treat his symptoms and it would cause him to doze off or be sleepy. That was difficult for me – that wasn't my father. It came to a point where I did not even want to see him.

10. I never had a real goodbye with my father. I have to live with that every day. I did not see him the last two weeks of his life, and that eats me up. I was thankfully able to make it to the hospital and see his final moments, although he was incoherent at that point.

11. Since my father's diagnosis, my life has not been the same. It changed instantly upon learning of his cancer, and I have gone down personal, mental, and physical paths that I regret. There are things I wish I could take back. It is really hard for me to think about and discuss. From the day he was diagnosed until two years after his passing, I struggled with addiction. Those are the hardest times in my life that I went through and probably will ever go through.

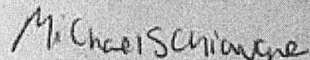
12. What happened to my father is not fair. He joined the New York City Police Department at 20 years old and retired from it at 40 years old. He planned it this way and had so

much more life ahead of him, only to get sick and pass away at 49 years old. I question it every day and ask why. It has taken a toll on me, and it still does every day even if I have become a stronger person through the experience.

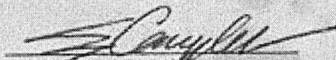
13. It was also difficult for me to watch how my father's illness and death has impacted the rest of my family. It is not fair to my mother, my sisters, or my grandparents. My grandparents had to bury their own child. I have only seen my grandfather cry twice in my entire life. The first time was at the celebration for his 50th wedding anniversary, and the second time was at my father's wake and funeral.

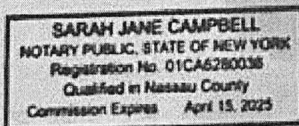
14. My father and I bonded over sports. I still play softball every week and wish he could be there to watch me play. I know he would be there smiling. Recently, I played against a person I grew up playing with. His father, who used to coach youth sports with my father, was there too to watch. It made me realize how much time flies when you are young. You take it for granted. Looking back at my younger years, those were the best times of my life.

15. I still miss and think about my father every day. I even go and visit his grave at the cemetery three or four times a week. I see people with their parents, and I question why I don't have my father. It doesn't make sense, and I do not think that I will ever have the answer. There are times in my everyday life that I wish he was here. I have realized that I took having him around for granted. My father was one of a kind.


MICHAEL JAMES SCHIAVONE

Sworn to before me this
20 day of July, 2022


Notary Public



Michael J. Ippolito

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
MICHELLE YVETTE AMIN, et al.

AFFIDAVIT OF
MICHAEL J. IPPOLITO

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.
-----X

STATE OF NEW YORK)

: SS.:

COUNTY OF RICHMOND)

MICHAEL J. IPPOLITO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 104 Florence Place, Staten Island, New York 10309.

2. My current age is 59 years old, having been born on August 24, 1962.

3. I am the brother of Donna Siciliano, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My sister passed away from lung cancer on August 19, 2013, at the age of 62. It was determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My sister and I had a great relationship in our childhood. She was eleven years older than me, so she was like a second mother to me. Growing up, she would always help me with my homework. She would try to keep me out of trouble, despite my best efforts to stay in it. I remember when I was a teen, she would come home from a night out of dancing and wake me up at 3:00 a.m. to get breakfast. As we got older, we stayed close. She developed a similar,

motherly relationship with my children.

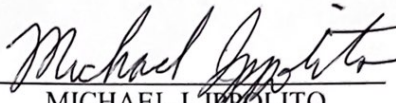
6. In September 2001, Donna lived in Gateway Plaza, located at 395 South End Avenue in Battery Park City, and worked for the New York Stock Exchange, located at 11 Wall Street. On September 11th, 2001, I picked Donna up from a friend's house in the city and brought her back to my house. Donna returned to her apartment to find it destroyed—the windows were shattered, and her apartment was covered with dust. She stayed with us until she was able to go back to her workplace, which she returned to on September 17th. I tried to talk her out of moving back to the city, because I knew the air wasn't safe. She said living in the exposure zone and walking through the ruins of the World Trade Center every day was depressing. She continued to live in the city for about three years, before moving into an apartment that I built for her in my basement.

7. Donna started to complain of neck and back pain. At first, we thought it was just the arrangement of her home office and that maybe it was causing her to have bad posture. The doctors gave her a muscle relaxant. Those didn't work, and then she started to develop a cough. The doctors recommended a lung X-Ray, which revealed that she had Stage IV lung cancer. She came home from the doctor and told me the news, and I was shocked. That was the only time she ever cried. It was so hard, because I wanted to stay strong for Donna but was also emotional and upset at the thought of losing her. When I laid down in bed at night, I would think about how Donna wasn't going to make it. That's when it got tough.

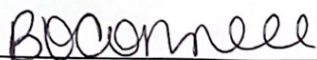
8. Donna lived in my home during the time she was ill. My family and I would take her shopping and cook for her. We would take her to doctors' appointments, treatments, and scans. We did everything we could to help support her. She had done so much for me during my life that I wanted to do things for her when she was sick. I would try to take her out to breakfast every week—it was a tradition we had since we were kids. One of the last times we had breakfast, she got sick in the restaurant as we were sitting at the table. But I told her, don't worry about it. But you could see changes in her health taking place. She became bedridden. A few weeks before she passed, her leg was starting to turn black.

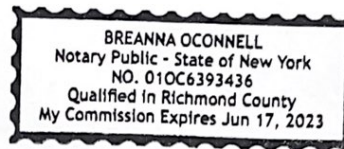
9. I lost a sister. I lost the closest person in my life to a mother. When I was growing up, I was the youngest of five. So, Donna was like a mother to me. Donna was a very good-hearted person. She spoiled my kids rotten; she was a great aunt. There were no limits to what

she would do for the kids. She had a hard time saying "no," and she would do anything for anyone. Everybody who knew her loved her. She was a good person. And she is very missed.


MICHAEL J. IPPOLITO

Sworn to before me this
14 day of July, 2022


Notary Public



Richard W. Ippolito

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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MICHELLE YVETTE AMIN, et al.,

**AFFIDAVIT OF
RICHARD W. IPPOLITO**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY)
 : SS.:
COUNTY OF MONMOUTH)

RICHARD W. IPPOLITO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 3701 South Flagler Drive, Unit ^B301, West Palm Beach, Florida 33405.

2. My current age is 74 years old, having been born on September 7, 1947.

3. I am the brother of Donna Siciliano, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My sister passed away from lung cancer on August 19, 2013. It was determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. Donna and I grew up together in Staten Island. We went to the same grammar school. She was four years younger than me, so it was my duty to look after her, get her on the bus, and things like that. I always looked out for her, and she would call me whenever she had problems. For a few years, we worked a few blocks away from each other and would get

together for lunch. She loved coming over to my house to visit my kids. I would see her probably 10 or 15 times per year. It was a good relationship.

6. In September 2001, Donna lived in a high-rise apartment building located at 395 South End Avenue. She was walking distance to the World Trade Center, and to the New York Stock Exchange, where she worked. She was working at the NYSE, located on Wall Street. On September 11, 2001, Donna evacuated the building around the time the first tower collapsed, running for her life to the East River. She was covered in soot from the dust cloud and got hosed down by the Fire Department. When she returned to her apartment, she discovered that the windows had been blown out by the force of the explosion. Her apartment was filled with soot and ash. She returned to work soon after 9/11. It was six months before she returned full time to her apartment, which by then was looted.

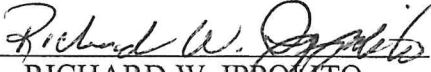
7. In January 2010, Donna had a cough which she wanted to get checked out. She was having trouble breathing. Her doctors sent her to Sloan Kettering, where she was diagnosed with stage IV lung cancer. The cancer had also spread to her brain. I went with her on her first trip to Sloan Kettering. Learning of her diagnosis was devastating.

8. I tried to be there for her as much as possible. I went with her to her follow-up visit and would take her to doctors' appointments and treatments. I gave her my car so she could get around to appointments and travel down to see relatives in Florida. I would visit her at home and try to provide emotional support for her.

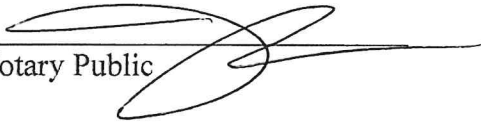
9. It was an extremely difficult time. I had already lost one sister, and now I had only one left. To watch Donna be destroyed by disease was devastating. By the end, she was so sick and debilitated that she didn't even remind me of my sister. It was her, but it didn't look anything like her. I miss her outgoing personality.

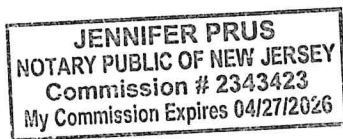
10. Donna was someone everyone knew. Everyone at the Stock Exchange especially knew her. She ran the toy drive at Christmas time for the New York Stock Exchange, and she made sure every broker there was involved. She was involved in raising money for many

causes. Everyone loved Donna. She was well-known, well-liked, and she was a beautiful woman with a great personality.


RICHARD W. IPPOLITO

Sworn to before me this
12 day of July, 2022


Notary Public



Angelina Ippolito

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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MICHELLE YVETTE AMIN, et al.,

**AFFIDAVIT OF
RICHARD W. IPPOLITO on
behalf of ANGELINA IPPOLITO**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

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STATE OF NEW JERSEY)
 : SS.:
COUNTY OF MONMOUTH)

RICHARD W. IPPOLITO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 3701 South Flagler Drive, Unit 301, West Palm Beach, Florida 33405.

2. My current age is 74 years old, having been born on September 7, 1947.

3. I am the brother of Donna Siciliano, upon whose death my claim is based.

4. I am the son, and personal representative of the Estate, of Angelina Ippolito, who passed away on March 10, 2017, prior to the commencement of the within action. I was appointed representative of my mother Angelina's estate on December 13, 2017, by the Circuit Court for Flagler County, Florida, Probate Division.

5. Angelina Ippolito was the mother of Donna Siciliano, upon whose death her claim is based. This Affidavit is submitted on behalf of the estate of Angelina Ippolito in connection with the pending motion for a default judgment and in support of her estate's solatium claim.

6. Angelina's daughter, Donna Siciliano, passed away from lung cancer on August 19, 2013. It was determined that this illness was causally connected to her exposure to the

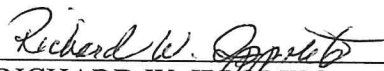
toxins resulting from the September 11, 2001, terrorist attacks.

7. My mother Angelina and my sister Donna were extremely close. We had another sister Geraldine who died about twenty years ago, so Donna was the only remaining daughter in the family. Donna was the baby of the family, and she was treated like the “golden child.” My mother loved Donna. Donna worked on Wall Street and lived in lower Manhattan. She would go to stay with our mom and dad down in Florida several times per year. My mom always looked forward to her visits.

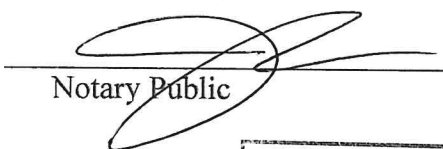
8. At the time of September 11, 2001, Donna was working as a manager at the New York Stock Exchange. She also lived nearby, in a condo in Battery Park City. When the attacks on the World Trade Center occurred, she and her coworkers evacuated the building. However, right as they got onto the street, the first tower fell. This big cloud of dust and debris came down upon them as they ran toward the East River. Once they got to the East River, Donna and her coworkers were covered in soot. They were hosed down by the Coast Guard and FDNY before boarding boats to New Jersey. Our mother was scared sick about Donna, because we couldn’t get in touch with her at first. Donna couldn’t go home to Battery Park, because the windows were blown out of her condo by the impact of the World Trade Center collapse. After we got back in touch with Donna, she called my mom and told her what happened. Donna took time off work and went down to Palm Coast, Florida, to visit our parents. After she returned to New York, she moved in with my brother on Staten Island while her apartment was being cleaned and repaired.

9. Donna eventually became sick with lung cancer a few years after she left the New York Stock Exchange. Donna retired from the Stock Exchange in 2009 and found out she had lung cancer about four years later. She told our mother about her diagnosis when she went down to visit her in Florida. Angelina was devastated to learn of her daughter’s diagnosis. Our mother was already in failing health; she was in her late eighties at the time. Shortly after Donna’s diagnosis, Angelina began to show signs of dementia. She was house-ridden and couldn’t drive anymore. Her only solace were Donna’s visits. Our mother provided a lot of emotional support for Donna. They spoke on the phone all the time, even when Donna became too sick to travel to Florida. But my mom’s condition was definitely deteriorating, she had many falls and had a harder time living independently.

10. When Donna passed away, our parents couldn't come to the funeral in New York. They were too old to leave their homes and get on a plane. My two brothers, Mike and Bob, and I would go visit my parents, taking care of them the best we could. My mother's dementia worsened after Donna's death. Donna was a big source of support in our mother's life. When Donna visited, they would play cards, sit out at the pool, and do puzzles together. All that went away after Donna died. Before she died, my mother would always ask where Donna was. It was truly heartbreaking.


RICHARD W. IPPOLITO
on behalf of ANGELINA IPPOLITO

Sworn to before me this
12 day of July, 2022


Notary Public

JENNIFER PRUS
NOTARY PUBLIC OF NEW JERSEY
Commission # 2343423
My Commission Expires 04/27/2026

Genarino Ippolito

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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MICHELLE YVETTE AMIN, et al.,

**AFFIDAVIT OF
RICHARD W. IPPOLITO on
behalf of GENARINO IPPOLITO**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

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STATE OF NEW JERSEY)
 : SS.:
COUNTY OF MONMOUTH)

RICHARD W. IPPOLITO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 3701 South Flagler Drive, Unit 301, West Palm Beach, Florida 33405.

2. My current age is 74 years old, having been born on September 7, 1947.

3. I am the brother of Donna Siciliano, upon whose death my claim is based.

4. I am the son, and personal representative of the Estate, of Genarino Ippolito, who passed away on February 11, 2017, prior to the commencement of the within action. I was appointed representative of my father Genarino's estate on _____ by the Circuit Court for Flagler County, Florida, Probate Division.

5. Genarino Ippolito was the father of Donna Siciliano, upon whose death her claim is based. This Affidavit is submitted on behalf of the estate of Genarino Ippolito in connection with the pending motion for a default judgment and in support of his estate's solatium claim.

6. Genarino's daughter, Donna Siciliano, passed away from lung cancer on August 19, 2013. It was determined that this illness was causally connected to her exposure to the

toxins resulting from the September 11, 2001, terrorist attacks.

7. My sister Donna was my father's favorite daughter. We had an older sister who was killed in a house robbery, so Donna was the only remaining daughter in the family. Our parents were retired, and Donna would go down to Florida to visit them several times per year. She would bring my father gifts, cook for him, and they would go out together to the stores. My father really loved Donna. She was very beautiful, and he would call her "Funny Face Donna." They had a great relationship; they were very close.

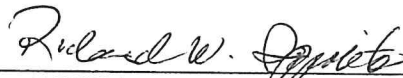
8. On September 11, 2001, Donna was working as a manager at the New York Stock Exchange. She also lived nearby, in a condo in Battery Park City. When the attacks on the World Trade Center occurred, she and her coworkers evacuated the building. However, right as they got onto the street, the first tower fell. This big cloud of dust and debris came down upon them as they ran toward the East River. Once they got to the East River, Donna and her coworkers were covered in soot. They were hosed down by the Coast Guard and FDNY before boarding boats to New Jersey. My father was very upset about what happened to Donna on 9/11. He was staunchly conservative and wanted the government to do something about the pain and suffering Donna and others had experienced on 9/11. He was even angrier that she was exposed to all the chemicals and toxins which would later make her sick.

9. Donna told our father right away when she was diagnosed with lung cancer. I took Donna to Sloan Kettering, where they did targeted radiation treatment on her. In between radiation treatments, Donna would go down to Florida to see my mom and dad. There was always hope during the visits that the cancer would be gone for good, but then she'd return to New York and go to her next appointment and the cancer was always back. It was devastating for him to see her sick. He was so upset when she started losing her hair, because she was really a beautiful woman. It was a slow two-year death, and our father was involved with Donna's care from day one.

10. Eventually, the cancer spread to Donna's brain. Unlike our mother, who had dementia, our father was mentally sharp the whole time. So, he witnessed and felt Donna's decline. It was heartbreaking for him—no one else in our family had ever died of cancer. Our father was pretty quiet after Donna died. He wasn't his effusive self. He would talk about Donna all the time. Every time he turned on the TV to watch the 9/11 anniversary, it would bring back

everything all over again for him.

11. Donna was a perfectly healthy woman who lived across the street from the World Trade Center and walked to her job at the New York Stock Exchange every day. She was loved by everyone at the NYSE, and she even worked for the president of the Exchange. It's pretty devastating for someone to go to work one day and have their whole life turned upside down. You see those videos of people running from the dust cloud at Ground Zero. She was one of those people. Her home was destroyed. When she returned home months later, it was looted. Her clothes, jewelry, everything was missing. Then, a few years later, everyone she knew and loved was getting cancer. Then, she became one of them. Donna's life was taken away—it took a little longer than those who died instantly on 9/11, but nonetheless her death was still caused by 9/11.

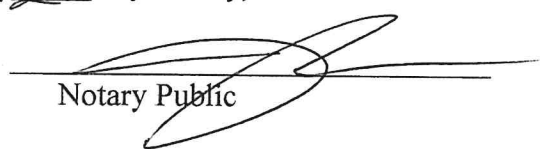


RICHARD W. IPPOLITO

on behalf of GENARINO IPPOLITO

Sworn to before me this

12 day of July, 2022



Notary Public

JENNIFER PRUS
NOTARY PUBLIC OF NEW JERSEY
Commission # 2343423
My Commission Expires 04/27/2026

Robert V. Ippolito

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
MICHELLE YVETTE AMIN, et al

**AFFIDAVIT OF
ROBERT V. IPPOLITO**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.
-----X

STATE OF GEORGIA)
 : SS.:
COUNTY OF GWINNETT)

ROBERT V. IPPOLITO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 2222 Glen Mary Place, Duluth, Georgia 30097.

2. My current age is 65 years old, having been born on August 7, 1956.

3. I am the brother of Donna Siciliano, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My sister passed away from lung cancer on August 19, 2013, at the age of 62. It was determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. Donna had a huge involvement in my life. She was five years older than me, and she was my mentor going through grade school. She would take me to the bus every day. When I got in a scuffle in grade school, the teacher told me I was nothing like my sister. In my late teens and early twenties, my sister and I became even closer friends. My friends and her friends would always do things together. We would go to dance clubs—Donna was a disco queen and

loved to dance. Donna and I would bowl in a mixed doubles league. In 1979, when Donna was ten years into her career, she introduced me to someone who would help me jumpstart my own career. She was my mentor. She wasn't afraid to call me out when I had a big ego. In 1998, I moved to Atlanta and would fly up to New York every other week. I would make it a point to see Donna. We talked on the phone all the time.

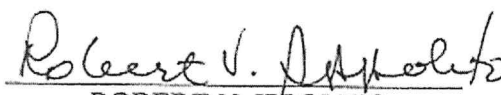
6. Donna worked for the New York Stock Exchange, located on Wall Street. We would often have lunch together during the workday, before I moved to Georgia. On September 11, 2001, I was on the phone with a client when they told me a plane had just flown into the World Trade Center. I was three blocks walking distance away from my office, and when I got there, I immediately put the TV on and called Donna. She told me her building was being evacuated, and that she had to go. I tried calling her all day, but the phone lines were down. I was scared to death. When I finally spoke to her, she was a mess. She told me she evacuated to the east side of the city and was sprayed down with a hose to get the dust, asbestos, and soot off her. She returned to work soon after 9/11. Donna also lived at Gateway Plaza in Battery Park City, and her apartment had been destroyed by the impact of the towers falling. When she returned six months later to her apartment, the windows were blown out and her apartment was looted and destroyed. Everything she had was gone. When she finally moved back to the city, she moved into a new apartment across the street.

7. I think Donna had PTSD from her memories of 9/11. She had trouble sleeping and had nightmares about what she saw. I continued to talk to Donna on the phone almost every day. She first started to complain of a little bit of back pain. At first, I didn't think it was a big deal. But she went in to get some tests, and they uncovered the lung cancer. By the time she was diagnosed, she was already stage IV. When she actually got the diagnosis, she called me crying. As her brother, I was thinking, "Stage IV, that's a death sentence." It's what we were all thinking, but we were all trying to be there for her and coach her through this.

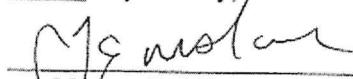
8. I just talked to her constantly, trying to be her emotional support. My brother Mike and his wife Lucille helped take care of her up in New York. I would fly back up to New York to visit her as much as I could. One of my last memories of her was a trip we took right before she died. I hate remembering her like that, in the wheelchair. It's like it wasn't even her.

9. One of the sad things about Donna's life is that she never had kids. Donna would have been an incredible mother. She was "Super Aunt" in our family. She had so many nieces and nephews who loved her. She was everybody's favorite aunt. She also ran the annual Toy Drive for the New York Stock Exchange. The toy drive was sponsored by the Salvation Army. It was so successful that the Salvation Army put Donna on the centerfold of their pamphlet. Donna brought in hundreds of thousands of dollars worth of toys every year, and she was solely responsible for that.

10. Everyone on the New York Stock Exchange knew Donna. When I went to visit her there, all you'd hear is, "Hey Donna!" "Hi Donna!" Her funeral service was packed. There must have been hundreds of people from the Stock Exchange there. Donna is truly missed. I love my brothers, of course. It hurts to have lost both of my sisters. To not be able to hug my Donna anymore—I still get choked up over it, all these years later. Shortly after Donna's death, I saw her in a dream. I had a dream that we were sitting on the couch, watching TV. She turned to me and said, "It's okay, Rob. I'm okay." It was the most surreal moment. She was taken from us way too soon.


ROBERT V. IPPOLITO

Sworn to before me this
22 day of July, 2022


Notary Public



Tracy Ann Cicchetti

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
MICHELLE YVETTE AMIN, et al.,

AFFIDAVIT OF
TRACY ANN CICCHETTI

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW JERSEY)
 : SS.:
COUNTY OF GLOUCESTER)

TRACY ANN CICCHETTI, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 34 Aspen Hill, Deptford, New Jersey 08096.

2. I am currently 50 years old, having been born on March 8, 1972.

3. I am the sister of Stephen E. Skipton, Sr., upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My brother passed away from kidney cancer on August 23, 2014, at the age of 41. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. As children, my brother and I were not all that close, but that changed as we grew older. We loved going places together, like beaches and museums. Once we both had daughters, we bonded even tighter. Every Easter, my daughter and I would fly from New Jersey to South Carolina to visit Stephen and his family, and every summer they would fly up to New Jersey to visit us. He was such a supportive and caring brother. He was a rock for me throughout my

divorce.

6. I was teaching on the day of 9/11 and watched the events as they unfolded on television. I called Stephen to see if he had seen what happened, and he told me that he was already on his way to the site. All I could do was ask him to please be careful. He was part of the recovery team on the day of and for a few weeks afterward. That was as much as I could get out of him. He did not like to talk about his experiences and what he witnessed.

7. In November of 2013, Stephen started experiencing a lot of pain. Since the pain seemed to be located in the area of his kidneys, we thought that it might be kidney stones. On April 1, 2014, he called my mother and me to tell us that his doctors had found lesions on his lungs. Later that April, I flew down to South Carolina for his daughters' communion. Other than a persistent cough, I remember thinking that he seemed healthy. This is the last time I would see him appearing healthy.

8. I couldn't physically be with Stephen in South Carolina during the beginning of his illness because I had an obligation to see my students through to the end of the school year. There were times when I would take a day off here and there to be with him, but most of the time my support took place over the phone. Once summer break came around, I flew down to South Carolina to be there for Stephen. After having to offer support only through phone calls, I was happy to be there for him in person. Even though I had to miss out on summer tutoring opportunities, I was glad to do what I could and support Stephen and his family. I spent a lot of time helping take care of their girls and occupying their time. It wasn't easy to be there for Stephen and have the critical task of watching his children. Sometimes, I felt like I was being pulled in different directions.

9. It is a lonely feeling not having my brother around. He was my only sibling, and losing that bond is terrible. I'm afraid of the day I lose my mother. I've lost my father and brother, and my mother is rapidly aging. Once I lose her, I will be completely alone. Sure, I have my daughter, nephew and nieces, and sister-in-law, who are all amazing, but I will have lost those who know me the best, those who watched me grow and know every side of me. I sometimes become overwhelmed with emotion thinking about it. I wish I still had my brother here to grow old with and share those wonderful "remember when" stories. It's hard knowing that he missed his son's wedding and his daughters growing up. It would have made him so

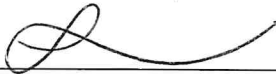
happy to be present for their milestones. It's hard knowing he had so many dreams left to accomplish. It is especially hard seeing how his loss has affected his wife Jen and their kids. It is incredibly unfair.

10. My brother's death will continue to affect me for the rest of my life. His illness and death changed the way I teach my students about 9/11. I now teach my students how the events continue to affect people today. The whole thing is heartbreaking. I think of him every day. My heart still aches for my mother, who had to bury a child. I can't even imagine what that must have been like for her. Awful doesn't even begin to describe it. I pray I never know. I am not a person who cries easily, but I get choked up when I think of Stephen. My mind will forever be flooded with "what ifs" and second-guessing.


TRACY ANN CICHETTI

Sworn to before me this

6 day of ~~June~~, 2022
July



Notary Public

